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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S STATEMENT OF
OBSERVED INTEREST AND POTENTIAL
CONCERN REGARDING FOREIGN
REVIEW OF PROTECTED
INTELLECTUAL PROPERTY (IP)

15 Dated this: April 23, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

TO THE HONORABLE COURT:

I. NOTICE OF OBSERVED DIGITAL INTEREST

Plaintiff respectfully notifies the Court and opposing counsel of a recent observation involving access to Plaintiff's public website. Web analytics indicate that digital traffic from Viettel Group, a large Vietnamese state-owned enterprise with military affiliations, has reviewed content related to Bloodborg: The Harvest and the Plaintiff's filings in this litigation.

This activity was noted shortly after Plaintiff's inclusion of a Vietnam-based live-action spin-off series in Dkt. 98: PLAINTIFF'S STATEMENT OF ARCANE-RELATED EXPANSION AND CONTINUING IP INFRINGEMENT, which references Riot Games' narrative expansion strategy built on allegedly infringing source material.

II. CONTEXTUAL BACKGROUND

Viettel Group is a telecommunications and technology conglomerate owned by Vietnam's Ministry of National Defence. It has been designated in international policy discussions as part of emerging Military-Civil Fusion (MCF) efforts—a geopolitical framework wherein commercial and state-controlled enterprises cooperate on technological development with both civilian and strategic applications.

Public records and independent reporting suggest that Viettel Group is active in:

- Telecommunications infrastructure
- Cyber and AI development
- International film, media, and cultural initiatives

The Plaintiff has not named or implicated Viettel Group in any claims in this case, and this Statement does not allege any misconduct by Viettel.

III. STATEMENT OF CONCERN

Given the geopolitical sensitivity of state-linked actors reviewing protected IP amid litigation involving one of the world's most valuable entertainment properties, Plaintiff raises the following potential concerns:

Preservation of Evidence – Whether any shared or observed materials may be copied, disseminated, or commercialized internationally before a judicial resolution is reached.

Foreign IP Scrutiny – The nature of interest from a defense-affiliated foreign group toward Plaintiff's original literary IP raises complex issues of oversight, attribution, and disclosure.

1 Pattern of Global Exploitation – The Plaintiff has already raised concerns
2 regarding the use of Bloodborg-based material as a foundation for multi-billion-dollar
3 transmedia projects, including reported live-action projects set in Vietnam. The current
4 observation may be consistent with ongoing narrative development.
5

6
7 **IV. REQUEST FOR TRANSPARENCY AND PROTECTIVE**
8 **CONSIDERATION**

9 Plaintiff respectfully requests the Court’s attention to this issue and recommends
10 the following:
11

12 That this Statement be entered into the record in support of Plaintiff’s ongoing
13 request for forensic inspection and metadata preservation.

14 That any discovery produced regarding Arcane’s live-action adaptations include
15 disclosures of foreign partnerships, co-production agreements, or developmental relationships,
16 especially involving actors with known state links.
17

18
19 That Riot Games confirm whether any Vietnamese production or technology
20 partners (including but not limited to Viettel Group) have been granted access to Bloodborg-
21 related materials or derivative development content.
22

1 This Statement is submitted solely for the purpose of judicial transparency and
2 proactive oversight. Plaintiff reserves all rights and claims and does not seek to expand the scope
3 of current litigation with this document.
4

5 However, given the already documented geo-political concerns, The Plaintiff is
6 worried about Riot Games alignment with numerous Military Industry entities outside of the US
7 and UK and allied states.
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Exhibit A - Viettel Group

Viettel

Vealecom company

The Military Industry and Telecoms Group, trading as Viettel or Viettel Group, is a Vietnamese state-owned multinational telecommunications, technology and manufacturing conglomerate headquartered in Hanoi, Vietnam.

4/23/25, 10:11:54 AM

116.108.125.154

Book: Bloodborg: The Harvest

Location:

Quan Bon, Hồ Chí Minh city, Vietnam

Referrer:

www.google.com/

Win10

Chrome

Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/135.0.0.0 Safari/537.36 Edg/135.0.0.0

4/21/25, 9:23:08 PM

69.165.212.228

Exhibit B- Screenshots of Viettel Group IP address.

Incorrect location? [Contact DB-IP](#) [view map](#)

Geolocation data from **IPregistry.co** **Product: API, real-time**

IP ADDRESS: 116.108.125.154	ISP: Viettel Group
COUNTRY: Vietnam 🇻🇳	ORGANIZATION: Viettel Group (viettel.com.vn)
REGION: Hồ Chí Minh	LATITUDE: 10.75005
CITY: Ho Chi Minh City	LONGITUDE: 106.65672

Incorrect location? [Contact IPregistry.co](#) [view map](#)

Geolocation data from **IPGeolocation.io** **Product: API, real-time**

IP ADDRESS: 116.108.125.154	ISP: Viettel Corporation
COUNTRY: Vietnam 🇻🇳	ORGANIZATION: Viettel Group
REGION: Ho Chi Minh City	LATITUDE: 10.82310
CITY: Ho Chi Minh City	LONGITUDE: 106.62965

Incorrect location? [Contact IPGeolocation.io](#) [view map](#)

Geolocation data from **IPapi.co** **Product: API, real-time**

IP ADDRESS: 116.108.125.154	ISP: Viettel Group
COUNTRY: Vietnam 🇻🇳	ORGANIZATION: Viettel Group
REGION: Ho Chi Minh	LATITUDE: 10.822

Exhibit C- Viettel Group looking at Bloodborg.

The screenshot shows the 'Engagement' page of the M.W. Wolf's Megaverse website. The page has a sidebar with navigation links: Website, Products & Services, Content & Memberships, Scheduling, Donations, Invoicing, Email Campaigns, Contacts, Analytics, Traffic, Engagement (selected), Sales, and Finance. The main content area displays a table of visitor activity with columns for Date & Time Visited, Visitor IP Address, and Page Visited. The table lists 15 entries, with the first entry highlighted in blue.

Date & Time Visited	Visitor IP Address	Page Visited
4/23/25, 10:11:54 AM	116.108.125.154	Book: Bloodborg: The Harvest
Location: Quan Son, Hồ Chí Minh city, Vietnam	Referrer: www.google.com/	Mozilla/5.0 (Windows NT 10.0; Win64; x64; AppleWebKit/537.36 (KHTML, like Gecko) Chrome/135.0.0.0 Safari/537.36 Edg/135.0.0.0
4/21/25, 9:23:08 PM	69.165.212.228	Home
4/21/25, 9:20:38 PM	192.91.144.20	Book: Bloodborg: The Harvest
4/21/25, 3:58:58 PM	81.147.196.244	Book: Bloodborg: The Harvest
4/21/25, 11:43:29 AM	192.37.129.152	Literary Series: Pocket Multiverses
4/21/25, 11:42:37 AM	192.37.129.152	100 things stolen from Bloodborg to make Arcane
4/21/25, 11:39:22 AM	192.37.129.152	Sinners Curtain by M.W. Wolf
4/21/25, 11:39:12 AM	192.37.129.152	Chronicles of The Megaverse
4/21/25, 11:39:01 AM	192.37.129.152	Home
4/21/25, 11:38:32 AM	192.37.129.152	Home
4/21/25, 10:20:28 AM	208.105.214.69	Chronicles of The Megaverse
4/20/25, 11:21:49 PM	173.234.161.135	Chronicles of The Megaverse
4/20/25, 11:18:00 PM	34.202.268.88	Chronicles of The Megaverse
4/20/25, 11:14:21 PM	81.133.80.246	Different is what I do!
4/20/25, 9:37:18 PM	23.82.129.21	Chronicles of The Megaverse
4/20/25, 9:36:40 PM	54.204.104.15	Chronicles of The Megaverse

This table provides a detailed view of the first entry from the engagement table. It shows the Date & Time Visited, Visitor IP Address, Location, Referrer, and Page Visited.

Date & Time Visited	Visitor IP Address	Page Visited
4/23/25, 10:11:54 AM	116.108.125.154	Book: Bloodborg: The Harvest
Location: Quan Son, Hồ Chí Minh city, Vietnam	Referrer: www.google.com/	Mozilla/5.0 (Windows NT 10.0; Win64; x64; AppleWebKit/537.36 (KHTML, like Gecko) Chrome/135.0.0.0 Safari/537.36 Edg/135.0.0.0
4/21/25, 9:23:08 PM	69.165.212.228	Home

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Location: Quan Son, Hồ Chí Minh city, Vietnam	Referrer: www.google.com/	Mozilla/5.0 (Windows NT 10.0; Win64; x64; AppleWebKit/537.36 (KHTML, like Gecko) Chrome/135.0.0.0 Safari/537.36 Edg/135.0.0.0
4/21/25, 9:23:08 PM	69.165.212.228	Home

PLAINTIFF'S STATEMENT OF OBSERVED INTEREST AND POTENTIAL CONCERN REGARDING
FOREIGN REVIEW OF PROTECTED INTELLECTUAL PROPERTY (IP)

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 23, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

5 Shetland Close

Coventry, England CV5 7LS

marc@mwwolf-fiction.co.uk